

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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2020 DEC -2 P 4: 03

USDC FOR NJ

**MICHAEL PATRICK SIANO**

Plaintiff Corporate Entity,

V.

**M&T BANK, PARKER McCAY P.A. LAW**

**OFFICES et al, and all Unknown Parties,**

Defendants.

Civil Action No.:3:20-cv-12827-MAS-DEA

**NOTICE OF OBJECTION TO LETTER**

**FROM JAMES P. BERG**

PLEASE TAKE NOTICE that upon receiving from Counsel of Defendant M&T BANK LETTER FROM JAMES P. BERG, I MICHAEL PATRICK SIANO object before the Honorable Michael A. Shipp, United States District Judge for the DISTRICT OF NEW JERSEY at the Clarkson S. Fisher Building and U.S. District Courthouse located at 402 East State Street, Trenton, New Jersey, 08608.

December 1, 2020

Hon. Michael A. Shipp, U.S.D.J.

United States District Court - District of New Jersey

402 East State Street – Courtroom 5W

Trenton, New Jersey

**Re: Michael Patrick Siano v. M&T Bank, et al. Civil Action No.: 3:20-cv-12827-MAS-DEA**

Dear Honorable Judge Shipp,

I respectfully ask the Court to not prejudice my Objection. Michael Patrick Siano is a pro se litigant and without the resources of a sophisticated law firm as my simple error of filing two days late portrays. The record shows that on November 25, 2020 the objection to the Defendants motion was stamped received and placed into the filing box for the Clerk of Court as I do not have the means to file electronically yet, however due to the holiday it was not officially filed into the record until November 30, 2020. This is a circumstance in which is clearly out of my hands and meant no trespass against court rules. As stated herein I am a pro se and my simple mixed up was in reading federal rule 12 and believing I had 21 days from day of service. November 25<sup>th</sup> 2020 seemed within the scope as I received via mail the Defendants motion on November 7, 2020. I respectfully ask this Honorable Court to allow me the wiggle room of the two days as pro se litigants are held to less stringent standards. *Haines v. Kerner 404 U.S. 519 (1972)*

Respectfully,

  
Michael P. Siano

(732) 788-0772

Mikee1987@yahoo.com

**CERTIFICATE OF SERVICE**

I, Michael Patrick Siano, do hereby certify that a true copy of the foregoing Objection, and this certification has been served upon by placing same in the U.S. Mail, properly addressed to as follows:

PARKER IBRAHIM & BERG LLP

270 Davidson Avenue

Somerset, Nj 08873

Andrew Sayles

Connell Foley LLP

56 Livingston

Avenue | Roseland, NJ 07068

A handwritten signature in black ink, appearing to read 'M. Siano', is written over a horizontal line.

Michael Patrick Siano